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August 2, 2001

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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Via Hand Delivery

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Ex Parte Presentation in CC Docket No. 96-98

Dear Ms. Salas:

Pursuant to Section 1.1206 of the Commission's rules, the Competitive Telecommunications Association ("CompTel") hereby gives notice that yesterday, its representatives, and representatives of CompTel member ITC[^]DeltaCom Communications, Inc. ("DeltaCom"), had five meetings with Commission staff to discuss the ability of competitive local exchange carriers ("CLECs") to obtain an enhanced extended loop ("EEL") where a DS1 interoffice transport segment is multiplexed onto a tariffed DS3 Special Access entrance facility. Separately, CompTel and DeltaCom met with Kyle Dixon, Legal Advisor to Chairman Powell; Matthew Brill, Legal Advisor to Commissioner Abernathy; Samuel Feder, Legal Advisor to Commissioner Martin; Jordan Goldstein, Legal Advisor to Commissioner Copps; and Daniel Shiman, Jeremy Miller and Julie Veach of the Common Carrier Bureau. These meetings were attended by Jonathan Lee on behalf of CompTel, Jerry Watts, Steve Moses and Tim Ford on behalf of DeltaCom, and the undersigned counsel.

In these meetings, CompTel and DeltaCom outlined their understanding that the Commission has considered issuing an interim order clarifying that CLECs are entitled to receive the type of EEL mentioned above pursuant to the *Supplemental Order Clarification* issued by the Commission in this proceeding last year. Without compromising their position that the Commission should expeditiously promulgate final rules removing all usage or other restrictions on EELs and other UNE combinations,

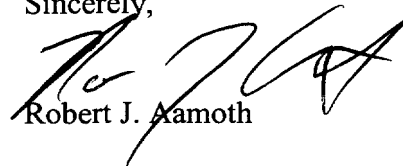
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Ms. Magalie Roman Salas
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CompTel and DeltaCom indicated their support for such an interim order. While not all CompTel members would find such an EEL to be of significant utility, other members, such as DeltaCom, already employ such configurations extensively in their existing networks through tariffed Special Access services and would receive tremendous efficiency benefits from being able to convert such configurations to EELs. Such benefits are particularly significant in secondary and tertiary markets where traffic density and network configurations make DS1 interoffice transport an efficient solution for serving small and medium-sized business customers. DeltaCom noted that such relief would enable it to enter a number of smaller cities where there are currently no facilities-based CLECs, and to remain an active competitor in other cities where current market conditions might otherwise force its withdrawal. DeltaCom indicated that it currently has more than 3000 DS1 service configurations that it could immediately convert to EELs consistent with the *Supplemental Order Clarification* should the Commission grant the interim relief mentioned above. CompTel and DeltaCom used the attached diagrams to demonstrate that a CLEC serving smaller cities and less densely populated areas can achieve significant efficiency benefits from using a DS1 EEL that is multiplexed over a tariffed DS3 Special Access entrance facility.

Sincerely,



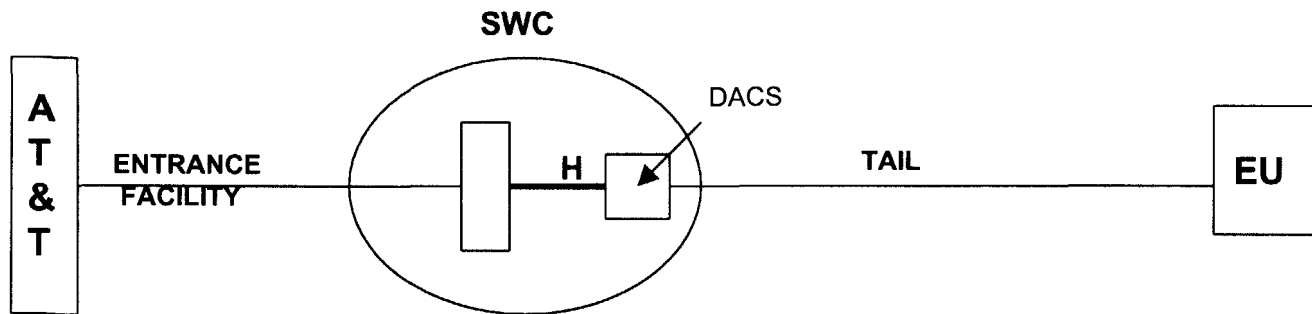
Robert J. Aamoth

Enclosure

cc: Kyle Dixon, Legal Advisor to Chairman Powell
Matthew Brill, Legal Advisor to Commissioner Abernathy
Samuel Feder, Legal Advisor to Commissioner Martin
Jordan Goldstein, Legal Advisor to Commissioner Copps
Daniel Shiman, Common Carrier Bureau
Jeremy Miller, Common Carrier Bureau
Julie Veach, Common Carrier Bureau

CONFIGURATION #9

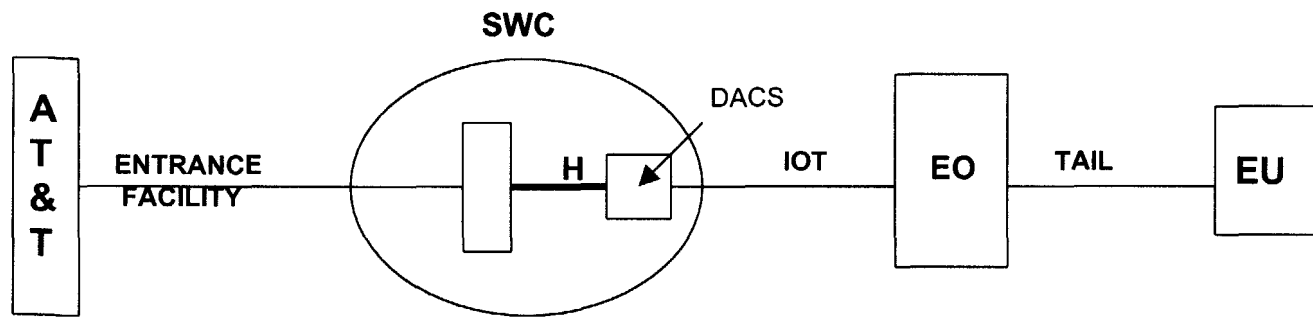
Entrance facility with hub and tail to end user



SWC = ILEC SERVING WIRE CENTER
EU = END USER
H = HUB (DS3 FACILITY)
DACS = 3-1 MUX

CONFIGURATION #10

Entrance facility with hub, transport and tail to end user



SWC = ILEC SERVING WIRE CENTER

EU = END USER

EO = END OFFICE

H = HUB (DS3 FACILITY)

DACS = 3-1 MUX

IOT = INTEROFFICE TRANSPORT